

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

COUNTER TERRORIST GROUP US and J. K. : Index No. 07-CV-6299 (DAB)
IDEMA, :

Plaintiffs, : **NOTICE OF MOTION**

v. :

ASSOCIATED PRESS, ASSOCIATED PRESS TV :
NEWS, PAUL HAVEN, STEPHEN GRAHAM, :
JASON STRAZZIO, AMIR SHAH, JOHN DOES 1- :
7. :

Defendants. :

----- X

TO: John E. Tiffany, Esquire
The Robert Treat Center
50 Park Place, 10th Floor
Newark, New Jersey 07102

Vijayant Pawar
Law Offices of VIJAYANT PAWAR
35 Airport Road, Suite 330
Morristown, New Jersey 07960

PLEASE TAKE NOTICE THAT pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying Memorandum of Law and the Declaration of David A. Schulz, Esq., Defendants The Associated Press and Associated Press Television News, Inc. (improperly identified in the Complaint as “Associated Press TV News”), by and through their undersigned counsel, hereby move to dismiss the Complaint filed by Plaintiffs Counter Terrorist Group US and J.K. Idema with prejudice.

Any opposition to this Motion must be served and filed by November 12, 2007.

Dated: New York, New York
October 25, 2007

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, L.L.P.

By: /s/ Gayle C. Sproul
David A. Schulz
Gayle C. Sproul
Michael Berry (*Pro Hac Vice Motion Filed*)
321 West 44th Street, Suite 510
New York, New York 10036
(212) 850-6100

*Attorneys for Defendants Associated Press
and Associated Press Television News, Inc.*

CERTIFICATE OF SERVICE

I, Gayle C. Sproul, hereby certify that on this 25th day of October, 2007, I caused a true and correct copy of the foregoing Notice of Motion of Defendants The Associated Press and Associated Press Television News, Inc. for dismissal of Plaintiffs' Complaint, the Memorandum of Law in support thereof, and the Declaration of David A. Schulz, Esquire to be served upon the following counsel of record via the Court's ECF system:

John E. Tiffany, Esquire
The Robert Treat Center
50 Park Place, 10th Floor
Newark, New Jersey 07102

Vijayant Pawar
Law Offices of VIJAYANT PAWAR
35 Airport Road, Suite 330
Morristown, New Jersey 07960

/s/ Gayle C. Sproul
Gayle C. Sproul